

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

INTERNATIONAL BUSINESS MACHINES
CORPORATION,

Plaintiff,

vs.

PLATFORM SOLUTIONS, INC.,

Defendant.

Civil Action No. 06 cv 13565-~~SCR~~ *SCR*

REQUEST FOR LEAVE TO WITHDRAW

Pursuant to Local Rule 1.4, James T. Southwick of Susman Godfrey LLP respectfully requests leave to withdraw as counsel of record for Defendant and Cross-Complainant Platform Solutions, Inc. in the above-captioned matter for reasons set forth in the attached affidavit. Stephen Susman, Stephen Morrissey, Jacob Buchdahl, Tibor Nagy, and Ryan Kirkpatrick, all of Susman Godfrey LLP, will remain as counsel of record for Platform Solutions, Inc. In addition, this litigation is in its early stages. Accordingly, Mr. Southwick's withdrawal will not prejudice either party or delay this litigation in any way.

Dated: June 8, 2007

STEPHEN D. SUSMAN
STEPHEN E. MORRISSEY (Pro Hac Vice)
TIBOR L. NAGY
RYAN KIRKPATRICK (Pro Hac Vice)
SUSMAN GODFREY L.L.P.

APPLICATION GRANTED

Stephen C. Robinson
HON. STEPHEN C. ROBINSON

7/20/07

By: /s/ Ryan C. Kirkpatrick

Ryan C. Kirkpatrick
Attorneys for Defendant and Cross-Complainant
Platform Solutions, Inc.

